

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 22-20104-CR-JEM(s)(s)(s)

UNITED STATES OF AMERICA

vs.

ARCANGEL PRETEL ORTIZ, *et al.*,

Defendants.

_____ /

THE GOVERNMENT’S MOTION FOR A PROTECTIVE ORDER

COMES NOW, the United States of America, through its undersigned counsel, respectfully requests that the Court enter the attached signed stipulation as a protective order.

1. The government and ANTONIO INTRIAGO (“INTRIAGO”), WALTER VEINTEMILLA (“VEINTEMILLA”), JAMES SOLAGES (“SOLAGES”), JOSEPH JOEL JOHN (“JOHN”), JOSEPH VINCENT (“VINCENT”), GERMAN ALEJANDRO RIVERA GARCIA (“RIVERA”), CHRISTIAN SANON (“SANON”), and FREDERICK JOSEPH BERGMANN, Jr. (“BERGMANN”) (together, the “defendants”),¹ signed a stipulation, attached as Exhibits 1a through 1h, to govern the handling and to maintain the secrecy of certain materials the government anticipates providing to the defense in advance of trial in this case. As that stipulation explains, it is intended to protect the safety of witnesses, law enforcement personnel,

¹ Defendant ARCANGEL PRETEL ORTIZ’s representation is currently the subject of a *Garcia* inquiry. DE 143 and 146. Immediately upon the resolution of this issue, the government will confer with counsel for ORTIZ to seek a similar stipulation. The Court previously granted the motion for defendants MARIO ANTONIO PALACIOS PALACIOS (*see* DE 26), and RODOLPHE JAAR (*see* DE 40).

U.S. persons stationed abroad, and the families of those respective individuals, as well as the integrity of the on-going investigations and operations.

2. The government respectfully requests that the Court endorse the parties' stipulation such that it could have the force of a protective order.

Respectfully submitted,

MARKENZY LAPOINTE
UNITED STATES ATTORNEY

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I filed the foregoing document with the Clerk of the Court and served copies upon counsel of record for the defendant via electronic mail on March 13, 2023.

/s/ *Andrea Goldberg*

Andrea Goldberg
Assistant United States Attorney